

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
TEXARKANA DIVISION**

GLORIA BRADFORD, Individually	§
and as Class Representative on	§
Behalf of All Similarly Situated	§
Persons; NED BURNETT, JR.,	§
Individually and as Class Representative	§
On Behalf of All Similarly Situated	§
Persons; SAMUEL ALEXANDER,	§
Individually and as Class Representative	§
On Behalf of All Similarly Situated	§
Persons; BOOKS ETC., by and through	§
GLORIA BRADFORD, Class	§
Representatives on Behalf of All Those	§
Similarly Situated; and STELLA	§
PATRICIA SMITH, Individually and as	§
Class Representative on Behalf of All	§
Similarly Situated Persons,	§
Plaintiffs,	§
vs.	§
UNION PACIFIC RAILROAD	§
COMPANY,	§
Defendant.	§

CAUSE NO. 4:05-cv-4075 HFB

**AGREED MOTION FOR ENTRY OF
CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER**

Defendant Union Pacific Railroad Company (“Union Pacific”) files this Agreed Motion for Entry of Confidentiality Agreement and Protective Order in this cause, and would show the Court as follows:

1. The parties have conferred and agreed to the terms of a Confidentiality Agreement and proposed Protective Order.

2. The parties have approved in writing a proposed form of Confidentiality Agreement and Protective Order, and submit the same for approval by the Court.

Wherefore, premises considered, the parties respectfully request that the Court enter the proposed Confidentiality Agreement and Protective Order submitted to the Court contemporaneously with this Motion.

Respectfully submitted,

/s/ Sean F. Rommel
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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon all counsel of record in the above action who have agreed to service by electronic filing, and to the following counsel of record by regular United States mail, on this 27th day of June, 2006:

Barry G. Reed
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/s/ Sean F. Rommel
Sean F. Rommel